

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	4:12-cr-503
	§	(Hon. Lee H. Rosenthal)
JASON DANIEL GANDY	§	

**UNOPPOSED MOTION FOR LEAVE
TO FILE PRETRIAL MOTION**

COMES NOW JASON DANIEL GANDY, DEFENDANT, through counsel Sean Buckley, and files this Unopposed Motion for Leave to File Pretrial Motion, for cause showing the Court as follows:

1. The pretrial motions deadline set by the Court has passed.

Undersigned first appeared as counsel for Defendant ten days ago, on June 7, 2018.

In the interim, the deadline set by the Court for filing pretrial motions has passed.

2. Defendant has a colorable Speedy Trial claim that should be considered by the Court in the interest of justice.

Defendant requests leave of court to file a Motion to Dismiss Count One of the Second Superseding Indictment based on an alleged Speedy Trial violation. Defendant's Speedy Trial claim is not frivolous, and should be considered by the Court in the interest of justice.

3. Relief requested.

Defendant respectfully requests permission to file his Motion to Dismiss Count One, to assert his Speedy Trial claim as to that count.

Respectfully submitted,

/s/ Sean Buckley
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Certificate of Conference

I certify that I discussed this Motion for Leave to File with Assistant United States Attorney Sherri Zack on this the 17th day of June, 2018, and she indicated that the Government is UNOPPOSED.

/s/ Sean Buckley
Sean Buckley

Certificate of Service

I certify that I provided a copy of this Motion to Dismiss Indictment for Lack of a Speedy Trial to Assistant United States Attorney Sherri Zack and all parties via the ECF system on this the 17th day of June, 2018.

/s/ Sean Buckley
Sean Buckley